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7	Attorneys for Plaintiffs SANRIO COMPANY, LTD. and SANRIO, INC.					
8						
9	UNITED STATES DISTRICT COURT					
10	NORTHERN DISTRICT OF CALIFORNIA					
11						
12						
13	SANRIO COMPANY, LTD., a Japanese corporation and SANRIO, INC., a California	Civil Action No. C 09-00440 MHP				
14	corporation,	STIPULATION TO EXTEND				
15	Plaintiffs,	DISCOVERY DEADLINES; [ <u>PROPOSED]</u> ORDER				
16	VS.					
17	J.I.K. Accessories, Inc., Accessitive Accessories, Inc., B.B. Apparels Inc., Amuseco					
18	Accessories, Inc., Nana Accessory, Inc., Seanna   Corporation, Heiress Enterprises, Inc., Pinkland   Corporation, Inc., Bliss, Final Choice, Joon Sik					
19	Bae, Yong Woo Kim, Any Bae, Jason Bae, Brian Ban, Ryan Bae, Ho Yong Na, Sang Wha					
20	Kim, Aeran Bae a/k/a Chris Bae, Jenny J. Lee,   Sukmin Bae, John Bae, Lisa Bae, Grace Kim,					
21	Ken Chung, Yeun Sik Cha, Debbie Kim, DOES   1-10,					
22	Defendants					
23						
24	Counsel for plaintiffs Sanrio Company, L	td. and Sanrio, Inc. ("Plaintiffs") and				
25	defendants that currently remain in the case respectfully submit this stipulation requesting an					
26	extension of time for discovery and other dates as follows.					
27	WHEREAS, plaintiffs and defendants J.I.	K. Accessories, Inc., Accessitive				
28	STIPULATION AND [PROPOSED] ORDER 1					

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1	Accessories, Inc., B.B. Apparels Inc., Amuseco Accessories, Inc., Joon Sik Bae, Andy Bae			
2	and Brian Bae (the "Joon Sik Bae Defendants") participated in further mediation on February			
3	28, 2010, subsequently agreed to settlement terms, and are currently finalizing their settlemen			
4	documents;			
5	WHEREAS, plaintiffs and the remaining undersigned defendants John Bae, Lisa Bae,			
6	Bliss and Final Choice (the "John Bae Defendants") are in active settlement discussions and			
7	expect to be able to settle without expending resources on further discovery;			
8	WHEREAS, on January 27, 2011, this Court granted the parties' stipulation to extend			
9	discovery deadlines to give the parties time to continue settlement negotiations;			
10	WHEREAS, the current deadline to complete fact discovery is April 29, 2011;			
11	WHEREAS, the Joon Sik Bae Defendants and the John Bae Defendants have			
12	requested additional time to respond to plaintiffs' outstanding discovery requests;			
13	WHEREAS, plaintiffs are willing to extend the deadlines for defendants' discovery			
14	responses, but would need additional time for follow-up discovery and depositions once			
15	defendants' responses are received (if the claims against these defendants are not settled);			
16	WHEREAS, counsel for all of the parties agree that extending the discovery deadlines as			
17	requested herein would increase the likelihood of reaching a successful settlement;			
18	WHEREAS, counsel for all of the parties request that discovery and other deadlines be			
19	extended accordingly;			
20	NOW, THEREFORE, by and through their counsel, the undersigned Parties hereby			
21	stipulate and request the Court to order as follows:			
22	1. Discovery and other deadlines shall be extended, with the new deadlines to be as			
23	follows:			
24	Last day to serve fact discovery: June 30, 2011			
25	Expert disclosure: June 30, 2011			
26	Rebuttal expert reports due: July 30, 2011			
27	Last day to serve expert discovery: August 30, 2011			
28	STIPULATION AND [PROPOSED] ORDER 2			

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1		Dispositive motions hearing:	:	17 October 14, 2011 at 2:00 p.m.
2		Trial:		November 15, 2011 at 8:30 p.m. or as soon
3				thereafter as the Court's calendar permits.
4		IT IS SO STIPULATED.		
5				
6				OWEN, WICKERSHAM & ERICKSON, P.C.
7	Date:	April 26, 2011	By:	/s/ Noel M. Cook
				NOEL M. COOK LINDA JOY KATTWINKEL
8				Attorneys for Plaintiffs
9				SANRIO COMPANY, LTD., and SANRIO, INC.
10				
11				BLEDSOE, CATHCART, DIESTEL,
12				PEDERSEN & TREPPA, LLP
12	Date:	April 26, 2011	By:	/s/ L. Jay Pedersen
13				L. JAY PEDERSEN
14				JOSHUA N. ROSEN
				Attorneys for Defendant ACCESSITIVE ACCESSORIES, INC.
15				,
16				TINGLEY PIONTKOWSKI LLP
17	Date:	April 26, 2011	Bv:	/s/ Bruce Pointkowski
18		<b>r</b>	- ,	BRUCE C. POINTKOWSKI
10				JONATHAN A. MCMAHON
19				Attorney for Defendants J.I.K. ACCESSORIES, INC.
20				ACCESSITIVE ACCESSORIES, INC.
21				B.B. APPARELS INC.
21				AMUSECO ACCESSORIES, INC.
22				JOON SIK BAE, ANDY BAE, and BRIAN BAE
23				LEACH AND MCGREEVY
24				
25	Date:	April 26, 2011	By:	/s/ Richard E. McGreevy RICHARD E. MCGREEVY
26				BRIAN LEACH Attorney for Defendants
27				Attorney for Defendants  JOHN BAE AND AERON BAE,
27				DBA BLISS AND FINAL CHOICE
28		ATION AND [PROPOSED] ORDER TEND DISCOVERY DEADLINE		3 C 09-00440 MHP

## IT IS SO ORDERED

Dated: <u>4/28</u> \_\_\_\_\_, 2011.



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